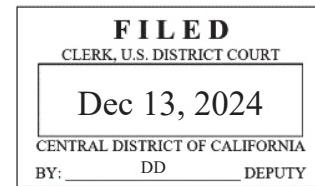


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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

12 UNITED STATES OF AMERICA,
13 Plaintiff,
14 vs.
15 ANASTASSIA KREZOUN,
16 Defendant.

17 Case No. 8:23-CR-00042-CJC

18 **VICTIM'S UNOPPOSED *EX PARTE*
19 APPLICATION FOR ORDER
SEALING (1) STIPULATION FOR
AN ORDER PERMANENTLY
SEALING DOCUMENTS IN
ACCORDANCE WITH NINTH
CIRCUIT ORDER; (2) ATTACHED
EXHIBIT TO THE STIPULATION;
20 (3) PROPOSED ORDER ON THE
STIPULATION, ALONG WITH ITS
ATTACHED EXHIBIT (ECF NO.
21 100)**

22 [[Proposed] Order Filed Concurrently
23 Herewith]

PLEASE TAKE NOTICE that the Victim, by and through his counsel of record, hereby applies *ex parte* for an order sealing ECF No. 100, specifically: (1) Stipulation For An Order Permanently Sealing Documents In Accordance With Ninth Circuit Order; (2) attached Exhibit A to the Stipulation; and (3) Proposed Order on the Stipulation, along with attached exhibit (ECF No. 100) (“Stipulation and Proposed Order”).

The Stipulation and Proposed Order should be sealed because it contains and references the same materials that the Ninth Circuit ordered the district court to permanently seal when granting the Victim’s petition for writ of mandamus. *See* Docket No. 98, Order, *In re: John Doe*, No. 24-3422 (9th Cir. Oct. 16, 2024) (ordering the district to “permanently seal the sentencing memorandum and all other provisionally-sealed documents”). The Stipulation and Proposed Order contains and references the same materials subject to the Ninth Circuit’s sealing order, and should accordingly be sealed on that basis.

Counsel for the government and counsel for the defendant have both stated by email that they do not object to the relief requested, namely that the Stipulation and Proposed Order (ECF 100) should be sealed in accordance with the Ninth Circuit's Order.

SIDLEY AUSTIN LLP

By: /s/ Douglas A. Axel
Douglas A. Axel

Attorneys for Victim

1 **DECLARATION OF DOUGLAS A. AXEL**

2 I, Douglas A. Axel, declare and state:

3 1. I am a partner at the law firm of Sidley Austin LLP, and represent the
4 Victim in the present matter. I have personal knowledge of the matters set forth in this
5 declaration, and if called to testify thereto, I could and would do so competently.

6 2. For reasons described in the Victim's sealing Application, the Victim
7 requests that the documents filed at ECF 100 all be filed under seal, namely the (1)
8 Stipulation For An Order Permanently Sealing Documents In Accordance With Ninth
9 Circuit Order; (2) attached Exhibit A to the Stipulation; and (3) Proposed Order on the
10 Stipulation, along with attached exhibit, all of which were efiled on December 5, 2024
11 (ECF No. 100) ("Stipulation and Proposed Order").

12 3. I conferred by email with AUSA Andrew Roach and Defendant's
13 counsel, Deputy Federal Public Defender Terra D. Castillo Laughton, on December 6,
14 2024, regarding the filing of the Stipulation and Proposed Order under seal. All
15 parties stated that they do not oppose this application to seal.

16 I declare under penalty of perjury under the laws of the United States that the
17 foregoing is true and correct, and that this declaration is executed this 6th day of
18 December 2024, in Los Angeles, California.

19
20 By: /s/ Douglas A. Axel
21 Douglas A. Axel